



PAT MCCRORY
Governor

DONALD R. VAN DER VAART
Secretary

MICHAEL SCOTT
Director

September 1, 2016

Mr. Lance Norris, Public Works Director
Town of Chapel Hill
405 Martin Luther King Jr Blvd
Chapel Hill NC 27514

RE: Chapel Hill Police Department Property
828 Martin Luther King Jr Blvd
Chapel Hill, Orange County
NONCD0001486

Dear Mr. Norris:

Thank you for providing the July 28, 2016 Phase II Remedial Investigation Work Plan, submitted by Hart & Hickman. The purpose of this letter is to summarize our comments. Please address the following concerns in a revised work plan:

1. Page 4, Section 2.1 of the work plan in the second paragraph, it is stated that the thickness of the coal combustion products (CCPs) at the site range from 3 to 15 ft. The maximum thickness reported by Falcon Engineering in the March 25, 2014 Environmental Site Characterization Report, was 25 feet, not 15. Please correct this and ensure that the corrected thickness is considered in the estimations made on total tonnage of CCPs placed at the site.
2. Title 15A NCAC 2T Section .1200 is referenced in Section 2.2 of the work plan and used to establish Maximum Ceiling Concentrations for pollutants within the CCP waste. However, the scope of Title 15A NCAC 2T applies to “the treatment, storage, transportation, use and disposal of coal combustion products that are defined as wastewater treatment residuals....”. Therefore, this set of regulations does not relate to the specifics of this site. In conducting the contaminant assessment, you must use the remedial goals for Unrestricted Land Use, outlined in Section 4.1 of the *Inactive Hazardous Sites Program Guidelines for Assessment and Cleanup* (Guidance). This does not mean these will apply as final remediation goals. Please modify the text as needed to reflect this.
3. Section 2.2 also references NC General Statute 130A-309.200-.222. While this letter does not serve to address the applicability of the Coal Ash Management Act (CAMA) on this site, use of the rules on closure of the structural fill sites in CAMA maybe useful at this site.
4. Antimony, Copper, and Mercury were not listed in Section 3.1, page 9, in the summary of metals that were detected above state groundwater standards. However, in Table 2A these parameters were

bolded to indicate an exceedance of these standards (Antimony in MW-1 on 5/3/13; Copper in MW-2 on 6/20/13 and Mercury in MW-4 on 2/5/14). Therefore, they should also be added to the list.

5. In Table 2A, MW-4, sample date 08/20/2014, lists the detected level for total chromium as 7000 ug/l. The lab results that were submitted by Falcon Engineering state that chromium was Below Reporting Limit (BRL). Please clarify.
6. Since the background levels of the compounds of potential concerns (COPCs) have not yet been fully delineated, the list of COPCs provided in section 3.6, page 14 and 15, should include all metals detected at the site, not just the ones that have exceeded a standard. Also, all media (groundwater, soil, sediment and surface water) should be sampled for all of the metals on the revised list of COPCs. This would include Zinc, which is a parameter found in past surface water sampling.
7. Please provide more information on the purpose of the CCP Cover Evaluation as outlined in Section 4.1.1. In particular, what will result from your visual observation of the top 2 feet?
8. When the revised work plan is submitted, please follow the certification instructions in Section 2.2 #18 of the Guidance.

Please provide an updated, signed and certified Phase II Remedial Investigation work plan that addresses the above list of concerns. If you have any questions or comments, please do not hesitate to contact me at (919) 707-8371 or amy.axon@ncdenr.gov.

Sincerely,



Amy Axon, Hydrogeologist
Superfund Section, Inactive Hazardous Sites Branch
Division of Waste Management

ecc: Curtis Brooks
Steven Hart
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